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December 1, 2015

Honorable Frank Maas  
United States Magistrate Judge for the  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: *In re Terrorist Attacks on September 11, 2001*, MDL 03-1570 (GBD) (FM)  
*Ashton et al. v. Al Qaeda Islamic Army et al.*, 02 CV 6977 (GBD/FM)**

Dear Judge Maas,

We are filing this letter-motion to request that the Court grant the attached amended proposed order of judgment on the *Ashton* plaintiffs' pre death conscious pain and suffering claims in connection with the judgment by default against Iran entered on August 26, 2015. Also filed with the amended proposed judgment is an Exhibit A listing the 851 decedents included in the *Ashton* motion. If there is anything else you require please let me know.

Respectfully submitted,

KREINDLER & KREINDLER LLP

By: Andrew J. Maloney

AJM/gm  
Enclosure

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